

FEB 16 2016

David J. Bradley, Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

UNITED STATES OF AMERICA

v.

GUSTAVO VARGAS-AGUILAR

ANGEL MARTIN MEZA

JENNIFER RODRIGUEZ

ROBERTO CARLOS FLORES-GARCIA

also known as "Comandante"

OLGA LYDIA LIRA

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Criminal No. M-14-841-S3

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

Count One

On or about May 16, 2014, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

GUSTAVO VARGAS-AGUILAR
ANGEL MARTIN MEZA
JENNIFER RODRIGUEZ
ROBERTO CARLOS FLORES-GARCIA
also known as "Comandante"
and
OLGA LYDIA LIRA

knowing and in reckless disregard of the fact that individuals, who were aliens, had come to, entered, and remained in the United States in violation of law, did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors to transport and move said aliens within the United States in furtherance of such violation of law, that is, that is, from a location near La Joya, Texas, to another location near La Joya, Texas, by means of a motor vehicle.

During and in relation to the above violation of law, the death of a person, namely, Edis Marisol Velasquez-Monterosa, resulted from said conduct.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(ii), and 1324(a)(1)(B)(iv).

Count Two

On or about May 16, 2014, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**GUSTAVO VARGAS-AGUILAR
ANGEL MARTIN MEZA
JENNIFER RODRIGUEZ
ROBERTO CARLOS FLORES-GARCIA
also known as "Comandante"
and
OLGA LYDIA LIRA**

knowing and in reckless disregard of the fact that Edis Marisol Velasquez-Monterosa was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly transport, move, attempt to transport, and attempt to move said alien within the United States in furtherance of such violation of law, that is, from a location near La Joya, Texas, to another location near La Joya, Texas, by means of a motor vehicle, for the purpose of commercial advantage and private financial gain.

During and in relation to the above violation of law, the death of a person, namely, Edis Marisol Velasquez-Monterosa, resulted from said conduct.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(iv).

Count Three

On or about May 16, 2014, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**GUSTAVO VARGAS-AGUILAR
ANGEL MARTIN MEZA
JENNIFER RODRIGUEZ
ROBERTO CARLOS FLORES-GARCIA
also known as "Comandante"
and
OLGA LYDIA LIRA**

knowing and in reckless disregard of the fact that Isias Aguilar-Perez was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly transport, move, attempt to transport, and attempt to move said alien within the United States in furtherance of such violation of law, that is, from a location near La Joya, Texas, to another location near La Joya, Texas, by means of a motor vehicle, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

Count Four

On or about May 16, 2014, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**GUSTAVO VARGAS-AGUILAR
ANGEL MARTIN MEZA
JENNIFER RODRIGUEZ
ROBERTO CARLOS FLORES-GARCIA
also known as "Comandante"
and
OLGA LYDIA LIRA**

knowing and in reckless disregard of the fact that Elidio Flores-Lopez was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly transport, move, attempt to transport, and attempt to move said alien within the United States in furtherance of such violation of law, that is, from a location near La Joya, Texas, to another location near La Joya, Texas, by means of a motor vehicle, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

A TRUE BILL

FOREPERSON

KENNETH MAGIDSON
UNITED STATES ATTORNEY



ASSISTANT UNITED STATES ATTORNEY